

Charlie A. Dooley
County Executive

Saint Louis
COUNTY
HEALTH

Dolores J. Gumm, MD
Director

April 24, 2013

Mr. Craig Almanza
Area Environmental Manager
Bridgeton Landfill, LLC
12976 St. Charles Rock Rd.
Bridgeton, MO 63044



Re: Bridgeton Landfill, LLC – Facility ID: 189-0312, Permit Number: OP2010-063
Response to March 25, 2013 Performance Test Extension Request

Dear Mr. Almanza,

On March 25, 2013 The Saint Louis County (SLC) Air Pollution Control Program (APCP) received a request from Weaver Boos Consultants, on behalf of Bridgeton Landfill, LLC, to extend the performance test deadline for the Bridgeton Landfill, LLC Callidus enclosed flare (SLC APCP Operating Permit #7735) until October 1, 2013.

As stated in the request dated February 27, 2013 from Weaver Boos Consultants, it is very likely that the Callidus enclosed flare will be used temporarily. Bridgeton Landfill, LLC intends to permit and begin operation of two 4,000 scfm candlestick open flares which are needed to effectively combust poor quality landfill gas. Bridgeton Landfill, LLC considers the performance testing for the Callidus enclosed flare required by 40 CFR Part 60 Subpart WWW §60.752(b)(2)(iii)(B), 40 CFR Part 60 Subpart A §60.8, and Saint Louis County Operating Permit #7735 Special Condition 2.A is unnecessary due to the flares temporary use. Bridgeton Landfill, LLC intends to cease operation of the Callidus enclosed flare within one year of start-up. Start-up of the Callidus enclosed flare occurred on October 3, 2012.

As stated above, Bridgeton Landfill, LLC intends to replace the two existing enclosed flares (SLC Operating Permits #5924 and #7735) with two 4,000 scfm candlestick open flares. Construction permit application was submitted for the proposed two candlestick open flares by Weaver Boos Consultants, on behalf of Bridgeton Landfill, LLC, on April 3, 2013.

A request for pre-construction prohibition waiver for the installation of the proposed two 4,000 scfm candlestick open flares was submitted by Weaver Boos Consultants, on behalf of Bridgeton Landfill, LLC, on April 12, 2013. Bridgeton Landfill, LLC proposes to begin the construction (procurement, site preparation, etc.) of the two 4,000 scfm candlestick open flares upon approval of the pre-construction waiver. With approval of the pre-construction waiver, Bridgeton Landfill, LLC anticipates full operation of the two 4,000 scfm candlestick open flares in June, 2013. Bridgeton Landfill, LLC will cease operation of the two existing

DIVISION OF ENVIRONMENTAL PROTECTION - CENTRAL

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enclosed flares (SLC Operating Permits #5924 and #7735) upon start-up of the two 4,000 scfm candlestick open flares.

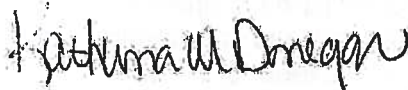
The Saint Louis County Department of Health Air Pollution Control Program (APCP) and the Missouri Department of Natural Resources' Air Pollution Control Program, approve the February 27, 2013 Performance Test Extension Request for the Bridgeton Landfill, LLC's Callidus enclosed flare (#7735) until October 1, 2013, with the following condition:

Should the Bridgeton Landfill, continue to operate the LLC Callidus enclosed flare (SLC APCP Operating Permit #7735) past July 1, 2013, the Bridgeton Landfill, LLC shall arrange for and plan to perform emissions testing on the Callidus enclosed flare in accordance with applicable regulations (NSPS WWW, SLC APCP Operating Permit #7735), or cease operation of the Callidus enclosed flare, by no later than October 1, 2013.

Should the Bridgeton Landfill, LLC, continue to operate Callidus enclosed flare without performance of applicable emissions testing past October 1, 2013, a Notice of Violation may be issued to Bridgeton Landfill, LLC for failure to perform emissions testing as required by 40 CFR Part 60 Subpart WWW §60.752(b)(2)(iii)(B), 40 CFR Part 60 Subpart A §60.8, and/or Saint Louis County Operating Permit #7735 Special Condition 2.A.

If you have any concerns regarding this matter, you may contact Jeremy Rogus at (314) 615-0926 or via-email at jrogus@stlouisco.com.

Sincerely,



Kathrina M. Donegan, MBA
Supervisor
Air Pollution Control Program
St. Louis County Dept. of Health

cc: Darcy Bybee, Missouri Department of Natural Resources
Michael Zlatic, St. Louis County Department of Health
Michelle Boussad, Weaver Boos Consultants
Gary Bertram, EPA R7